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# Wakulla Springs Alliance

*"Protecting and restoring water quality, spring flow and ecological health of Wakulla Spring."*

December 18, 2015

Moira Homann  
Watershed Planning and Coordination Section  
FDEP  
2600 Blair Stone Rd  
Tallahassee, FL 32399

Dear Ms. Homann:

The Wakulla Springs Alliance (WSA) is concerned about how DEP intends to select members for the Wakulla Springs OSTDS Advisory Committee. Earlier this week one of our Board members, Robert Deyle, spoke with Kevin Coyne, who indicated that DEP is contemplating naming only one member of the environmental/scientific community to this very important committee and that the agency may be considering partitioning the committee into subcommittees with different representation for each of the three major tasks listed in the final Wakulla Springs BMAP:

Identify, collect, and evaluate credible scientific information pertinent to the nutrient impact of OSTDS on Wakulla Springs.

Develop a public education plan that at a minimum provides area residents with reliable and understandable information about OSTDS systems and their effect on Wakulla Springs.

Develop an OSTDS plan that identifies cost-effective and financially feasible projects that target nutrient load reductions from OSTDS systems needed to implement the TMDL.

Mr. Coyne suggested that this single member from the environmental/scientific community might be consigned to a public education subcommittee. We strongly urge you to rethink this. Such token membership and pigeonholing would ignore both the knowledge and the long-held concerns that members of the environmental and scientific communities have contributed to the development of the Wakulla BMAP. We believe strongly that these viewpoints should be represented in the implementation of the plan as well.

We formally request that DEP select fully one third of the membership of the OSTDS Advisory Committee from members of the environmental/science community who (1) participated in the development of the BMAP; (2) have particular history and expertise to bring to the process; and (3) who do not represent local governments or state agencies. Successful implementation of the BMAP requires a complement of knowledgeable committee members who will put the interests of the Springs before the interests of the institutions they represent.

The Wakulla Springs Alliance has much to offer this committee. One of our members, Debbie Lightsey, played an active role in the public review of the draft BMAP. Ms. Lightsey has been involved in efforts to restore Wakulla Springs for over 15 years. She served on the Tallahassee City Commission from 1989 to 2010, devoting much of her efforts towards water quality and lake protection issues. She played a key role in staging the last major

Wakulla Springs Symposium which resulted in the 2009 Tri-Party Memorandum of Understanding between the City of Tallahassee, Leon County, and Wakulla County. She arranged funding by the three signatories for the 2011 Lombardo Report on OSTDS options for Wakulla Springs. She also played an important role in developing and promoting the \$2.8 million Blueprint Sales Tax project approved by the county and the city that will identify institutional and funding options for a Responsible Management Entity for OSTDS in Leon County.

The Alliance has two research projects underway that will contribute new knowledge important to mitigating the ecological problems in Wakulla Spring: (1) close the primary data gap in the NSILT nitrogen loading budget for the Wakulla Spring and River BMAP - the contribution from seepage into ground water from lakes and wet sinkholes within the "Lakes Region" of the Wakulla Springs springshed and (2) identification of the source of the color that has resulted in prolonged "green" dark water conditions at the spring since the mid 1990s. Preliminary findings from the latter study indicate that chlorophyll from outside the spring may be the primary color source and that the chlorophyll may be the result of nutrients from urban stormwater within the spring basin. WSA Board member Robert Deyle serves as project manager for these two initiatives. I serve as principal investigator.

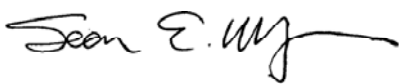
It is incumbent on DEP to get this next step right and to insure a balance of views in the deliberations on all three tasks of the OSTDS Advisory Committee. The public will have no confidence in a committee made up primarily of those who have repeatedly displayed an unwillingness to move forward to eliminate the sources of the pollutants that have so damaged the Springs. We recognize that one of the reasons stated by the Leon County Commission for authorizing County Attorney Herb Thiele to potentially file suit against DEP is their fear that the OSTDS Advisory Committee will recommend some substantive remediation of septic tanks in the Springshed over the next 3 years. We hope that is DEP's intent! How DEP constitutes this committee will be a critical first signal to the community as to whether that threat of a lawsuit is adequate to slow or inhibit efforts toward remediation in the future.

We urge you to consider the following individuals to serve on the OSTDS Advisory Committee:

- Robert Deyle - WSA Board member; Professor Emeritus of Environmental Planning, FSU
- Anthony Gaudio - Retired certified underground utility contractor and master septic tank contractor; Immediate Past President of Sustainable Tallahassee; WSA member
- Pamela Hall - former member Leon County Water Resources Citizens Advisory Committee and several other citizen advisory groups concerned with land use, comprehensive planning, and stormwater management
- Debbie Lightsey - WSA Board member; former Tallahassee City Commissioner
- Eric Livingston - Retired DEP Bureau Chief, Bureau of Watershed Management
- Seán McGlynn - WSA Board President; Technical Director McGlynn Laboratories
- Charles Pattison - Policy Director, 1000 Friends of Florida
- A representative chosen by the Friends of Wakulla Springs

Again, my primary point. We request that one third of the OSTDS Advisory Committee be knowledgeable, involved environmental/science people who do not work for local government and/or state agencies. We appreciate your time and would be happy to engage in further conversations about the next step in implementing the Wakulla Springs BMAP.

Sincerely,



Sean McGlynn  
President

cc: Kevin Coyne, BMAP Program Supervisor  
Greg DeAngelo, Program Administrator, Water Quality Evaluation Program  
Thomas Frick, Director, Division of Environmental Assessment and Restoration  
Drew Bartlett, Deputy Secretary for Water Policy and Ecosystem Restoration